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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

SECTION PARTNERS MANAGEMENT,
LLC,

Plaintiff,

vs.

EQUITYBEE, INC.; SECFL, INC.; SECFL
SECURITIES, LLC; SERENGETI ASSET
MANAGEMENT, LP; AND WOUTER
WITVOET,

Defendants.

Case No. 3:23-cv-05030-VC

**DEFENDANT EQUITYBEE, INC.'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER PLAINTIFF
SECTION PARTNERS MANAGEMENT,
LLC'S MATERIAL SHOULD BE
SEALED**

Judge: Hon. Vince Chhabria

Trial Date: August 25, 2025

Pursuant to Civil Local Rule 79-5 and the Stipulated Protective and Confidentiality Order entered by the Court on April 25, 2024 (“Protective Order”), Defendant EquityBee, Inc. (“EquityBee”) hereby submits this Administrative Motion to Consider Whether Plaintiff Section Partners Management, LLC’s (“SPM”) Material Should Be Sealed.

Defendant EquityBee’s concurrently submitted Motion to Dismiss Plaintiff SPM’s First Amended Complaint (“Motion to Dismiss”) is conditionally lodged under seal pursuant to Civil Local Rule 79-5(e). The unredacted version of EquityBee’s Motion to Dismiss Plaintiff SPM’s First Amended Complaint is attached to the Declaration of Maryam Arshad in support of this administrative motion as **Exhibit A**. (Declaration of Maryam Arshad in Support of Defendant EquityBee, Inc.’s Administrative Motion to Seal [“Arshad Decl.”] ¶ 2, Ex. A). Specifically, EquityBee conditionally files under seal all portions of its Motion that quote from or address terms of paragraph 13 of SPM’s First Amended Complaint (“FAC”), which SPM has conditionally filed under seal until this Court rules on SPM’s Administrative Motion to Seal. (*See* Pl.’s Admin. Mot. to Seal, ECF 31.)

SPM seeks to seal paragraph 13 of its FAC on the basis that SPM believes the information in paragraph 13 constitutes a trade secret under Federal Rule of Civil Procedure 26(c)(1)(G) and should be sealed from disclosure. SPM had served only the unredacted copy of the FAC when Defendant EquityBee agreed to consider the information in paragraph 13 of the FAC “Highly Confidential” pursuant to the Protective Order. (Declaration of Maryam Arshad in Support of Defendant’s Administrative Motion to Seal [“Arshad Decl.”] ¶ 3.)

For all of the reasons stated in EquityBee’s Motion to Dismiss, which are hereby expressly incorporated in this Administrative Motion, there is no good cause for sealing paragraph 13 of the FAC or sealing any portions of the Motion to Dismiss that quote from or address paragraph 13 of the FAC because the allegations contained in paragraph 13 do not constitute a trade secret.

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This application is also based on the information set forth in the Declaration of Maryam Arshad in Support of this Administrative Motion to Consider Whether Plaintiff SPM's Material Should Be Sealed, filed concurrently herewith.

DATED: May 17, 2024

THEODORA ORINGHER PC

By: 
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Maryam Arshad

William H. Wenke

Attorneys for Defendant EQUITYBEE, INC.